

## **REMARKS/ARGUMENTS**

### **Claim Amendments**

The Applicant has not amended any claims. Accordingly, claims 1-37 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the following remarks.

### **Claim Rejections – 35 U.S.C. § 103 (a)**

Claims 1-10, 14-22, 25-31 and 34-37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chang, et al (US 6,681,114) in view of Philyaw, et al. (US 6,835,799). In response, the Applicant respectfully disagrees. It is important to bear in mind that the present invention addresses the issue of distributing users among a plurality of network servers, wherein each user is given a plurality of user identifiers applicable for different services and wherein the distribution may be carried out independently from user identifier schemes, structures and applicable service.

The Examiner identifies FIG. 3 and profile database 107 as disclosing a secondary database having a user identifier. Additionally, the Examiner identifies FIG. 3 and profile proxy server 108 as disclosing a mechanism for transferring user identifiers and said selected service data to said secondary database from primary databases associated with respective network servers. A careful reading of Chang shows a unique primary database is associated with a unique network server (i.e., the profile proxy server 108 as illustrated in FIGs. 2 and 3), which is contrary to the object of the present invention, which is the distribution of users among a plurality of network servers. The Examiner's stated that Chang discloses a "mechanism for transferring user identifiers and said selected service data to said secondary database from primary databases associated with respective network servers (fig. 3, profile proxy server 108)." The Applicant respectfully disagrees with this characterization. The only plurality of user identifiers is associated with a plurality of users. Chang does not teach or suggest associating a single user with multiple user identifiers. The Examiner has failed to show anywhere in Chang that states a single user with multiple user identifiers or a "mechanism for transferring user identifiers and said selected service data to said

secondary database from primary databases associated with respective network servers (fig. 3, profile proxy server 108)." The Applicant respectfully contends that Chang does not, implicitly or explicitly, disclose a plurality of user identifiers for identifying the user under different service environments. Thus, Chang does not disclose "a secondary database having storage for a plurality of user identifiers for identifying the user under different service environments and selected service data per specific network server and per user basis."

Philyaw discloses a method and apparatus for tracking network activity of a user. A user PC runs tracking server that requires registration on a registration server. The registration server, in response to the user registering user information, sends a unique ID and bar code to the user PC. When the user accesses a vendor on the network user profile information is passed to the vendor and the vendor can extract information for targeting advertising to registered users. Philyaw also discloses a database that is associated with a Central Registration Server that stores the unique ID and user information in a CRS database. The ID is returned to the user in the form of a bar code having the unique ID number readable by the user. When the user visits a web site server, the user ID/barcode is utilized to track and log the user's activities and the unique ID/barcode is used to obtain user profile information stored in the Central Registration Server database.

The Examiner cites col. 26, lines 1-29 and col. 28, lines 1-20 as disclosing a storage for a plurality of user identifiers for identifying the user in different service environments, and selected service data per specific network server and per user basis. The Applicant respectfully disagrees with this characterization. In the "Response to Arguments" section of the Office Action, the Examiner cites the phrase "storing all user unique IDs and associated user profiles obtained during the registration process" as disclosing multiple IDs associated for one user. This phrase is taken out of context. In reality, this phrase merely is stating a plurality of user unique IDs corresponding to a plurality of users. No where else in Philyaw does it cite the use of multiple IDs for a single user. Following after the cited passage, Philyaw continues with an exemplary embodiment wherein the software on the PC passes the unique ID to the vendor web

server. The vendor web server, recognizing the unique user ID as one associated with the CRS, accesses the CRS to obtain the user profile information stored in the CRS database. Additionally, throughout Philyaw, reference is to a plurality of users each having one ID rather than multiple IDs. Thus, Philyaw does not disclose a user having a plurality of user identifiers, each user identifier being used for identifying the user under different service environments. In this respect, the statement made by Philyaw on col. 26 lines 14-16: "the CRS database connected to the CRS server and storing all user unique IDs and associated user profiles obtained during the registration process" can only be interpreted as it reads, that is, a database containing all user unique ID for the users, each user having a unique user ID. This statement does not teach or suggest a plurality of user identifiers for identifying a user under different service environments and selected service data per specific network server and per user basis, as the present application provides.

In addition, Philyaw does not disclose a flexible distribution of a plurality of user identifiers for the same user among a number of network servers, but rather a centralized database, either the registration server or, alternatively, the user PC itself. Moreover, there is neither motivation to find, nor any enabling disclosure of, primary databases associated with network servers, where the plurality of user identifiers for the user is distributed. Thus, Philyaw does not teach or suggest any transference of a plurality of user identifiers and selected service data for a user between these primary databases and a secondary database.

The Applicant respectfully submits that the obviousness rejection noted by the Response did not address "...a plurality of user identifiers..." as stated in claim 1. The rejection (para. 9, line 1) in the current and the previous Office Action was directed to "a user identifier (Fig. 3, profile database 107)" in contrast to the present invention's actual limitation of a plurality of user identifiers. The Applicant has reviewed the cited portions of the references applied to this limitation in the obviousness rejection of the current Office Action and the cited Philyaw reference regarding this limitation in the Response to Arguments. The Applicant respectfully asserts that neither Chang nor Philyaw

disclose a plurality of user identifiers; both references merely disclose the use of only one identifier for the user.

The Chang and Philyaw references both fail to teach a mechanism for transferring a plurality of user identifiers (this plurality is not disclosed by Chang) to identify the user under different service environments. Selected service data per specific network server and per user basis are also transferred from primary databases associated with respective network servers towards a secondary database included in the profile proxy server.

The Applicant respectfully disagrees that Chang and Philyaw, individually or in combination, teach or suggest 1) a plurality of user identifiers for use in different service environments, 2) a secondary database for storing the plurality of user identifiers, and 3) a mechanism for transferring the plurality of user identifiers and selected service data to the secondary database. This being the case, the Applicant respectfully requests the withdrawal of the rejection of claim 1.

Additionally, claims 17 and 35 include similar limitations as contained in claim 1. Claims 2-10 and 14-16 depend from claim 1 and recite further limitations in combination with the novel elements of claim 1. Claims 18-22, 25-31, and 34 depend from claim 17 and recite further limitations in combination with the novel elements of claim 17. Claims 36 and 37 depend from claim 35 and recite further limitations in combination with the novel elements of claim 35. Therefore, the allowance of claims 1-10, 14-22, 25-31 and 34-37 is respectfully requested.

Claims 11, 13, 21, 23, 24, 32 and 33 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chang, et al (US 6,681,114) and Philyaw, et al. (US 6,835,799) in view of Ejzak (US 6,871,070). In response, the Applicant respectfully disagrees.

With respect to claims 11 and 32, Ejzak is cited for teaching a Domain Name Server. However, Ejzak lacks the same limitations that are missing from the Chang and Philyaw references. The Applicant respectfully asserts that Ejzak does not disclose 1) a plurality of user identifiers for use in different service environments, 2) a secondary database for storing the plurality of user identifiers, and 3) a mechanism for transferring the plurality of user identifiers and selected service data to the secondary database.

With respect to claims 13 and 33, Ejzak is cited for teaching a LDAP. However, as previously noted, Ejzak does not make up the missing limitations of Chang and Philyaw.

With respect to claim 21, Ejzak is cited for teaching a Domain Name Server. However, Ejzak does not make up the missing limitations of Chang and Philyaw.

With respect to claim 24, Ejzak is cited for teaching a Serving Call Status Control Function (S-CSCF). As previously noted, Ejzak does not disclose the limitations that are lacking from the Chang and Philyaw.

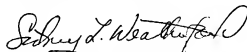
Additionally, claims 11 and 13 depend from claim 1 and recite further limitations in combination with the novel elements of claim 1. Claims 21, 23, 24, 32, and 33 depend from claim 17 and recite further limitations in combination with the novel elements of claim 17. Therefore, the allowance of claims 11, 13, 21, 23, 24, 32 and 33 is respectfully requested.

### CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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Date: February 1, 2007

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